

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

**IN RE NATIONAL COLLEGIATE
ATHLETIC ASSOCIATION STUDENT-
ATHLETE CONCUSSION INJURY
LITIGATION**

MDL No. 2492

Master Docket No. 1:13-cv-09116

**This Documents Relates To:
All Cases**

Judge John Z. Lee

Magistrate Judge Geraldine Soat Brown

DECLARATION OF RICHARD GORDON

I, Richard Gordon, pursuant to 28 U.S.C. § 1746, hereby declare on oath as follows:

1. I am the managing Partner at the law firm of Gordon Law Offices, Ltd., which has been retained alongside Edelson PC to represent Objector Anthony Nichols in this matter. I am over the age of eighteen and am fully competent to make this declaration. I make this declaration based upon person knowledge unless otherwise indicated. If called upon to testify as to the matters stated herein, I could and would competently do so.

2. Over the course of this litigation, my firm, along with attorneys at Edelson PC, and Clifford Law Offices, P.C. successfully raised a number of objections to the various settlements proposed by Class Counsel and the NCAA. As set out in Mr. Nichols' Petition for and Memorandum in Support of an Award of Attorneys' Fees and Service Award, our effort in this matter led to substantial improvements to the settlement that earned preliminary approval from the Court.

3. In support of the strategies incorporated to achieve the results set forth above, attorney at Gordon Law Offices did the following: examined and analyzed hundreds of Gordon

Law Office firm files to research and determine viable potential Gordon Law Office clients that would have interests furthered by objections to the various settlements proposed by Class Counsel and the NCAA; communicated via email and telephone with Gordon Law Office clients with interests that were furthered by these objections; specifically advised and updated Mr. Nichols as to the status of the case; researched, examined and analyzed treatises and texts relevant to the issues involved in the litigation; examined and analyzed pleading materials and engineered strategies regarding new proposed settlement terms as compared to settlement terms agreed to by Class Counsel and the NCAA; ordered, reviewed and maintained medical records for Mr. Nichols and others; examined and analyzed the extensive discovery produced by Class Counsel and the NCAA during the pendency of this matter; met with other counsel who had similar relationships with former NCAA athletes in order to address the status of the case and further advance the objections of Mr. Nichols; met and conferred with neurologists, neuropsychologists and others regarding the positions of Mr. Nichols; attended hearings; reviewed pleadings; conferred with co-counsel; and otherwise conducted the activities set forth in greater detail in the billing records of Gordon Law Offices.

4. As detailed in the chart below, to date attorneys from Gordon Law Offices have logged 349.5 hours in uncompensated time advancing objections on behalf of Mr. Nichols, resulting in a total balance of \$175,612.50 in attorneys' fees, exclusive of costs. In addition, the chart reflects the level of experience, billable rates, and the hours each attorney listed worked on this matter.

ATTORNEY (Position)	YEARS OF EXPERIENCE	HOURS	HOURLY RATE	TOTAL
Richard Gordon (Partner)	15	257.4	\$575	\$148,005.00
Alex Chez (Associate)	1	59.6	\$245	\$14,602.00

Robert Albrecht (Associate)	5	2.1	\$475	\$997.50
Min Hye Sim (Associate)	3	30.4	\$395	\$12,008.00
TOTALS				349.5 hours \$175,612.50

5. In my opinion, the expenditure of time by the attorneys and law clerks at Gordon Law Offices, Ltd. that worked on this matter is reasonable.

6. The hourly rates used to calculate the lodestar figure are the usual and customary rates charged for each individual in all of our cases.

I declare under penalty of perjury that the foregoing is true and correct.

Date: January 13, 2017

/s/ 
Richard Gordon